

## Privacy initiative and procurement form

Fill out this form when seeking approval for an initiative or procurement solution (referred to generally as “solutions”) that involves the collection, storage, processing, analysis, sharing, or other use of data or information (referred to generally as “usage of data”).

For support and questions, contact the Digital Privacy Officer at [digitalprivacy@sanjoseca.gov](mailto:digitalprivacy@sanjoseca.gov). Once completed, email this form to the Digital Privacy Officer or respond to the requestor.

**NOTE: An anonymized version of this document (removing contact and other personal information) may be readily available to the public on San José’s Digital Privacy webpage.<sup>1</sup>**

### Section 1

#### Main point of contact for solution

Name (first and last):

Department: ITD

Title: Business Process Automation Team Lead (PPM)

Email:

Phone:

#### Summarize the project below and how it uses data:

As a part of the Powered by People Initiative, the objective of IT Onboarding is to enable new hires to be ready to be productive in their new job on their first day. To fulfill that, many different teams across the City work together to complete onboarding activities behind the scenes through interrelated processes. Often these processes take longer than expected and as a result, new employees are not able to do their work on day one. The objective of this project is to optimize and automate the processes where possible, so that all process teams can complete their onboarding activities before the new hires onboard.

Where is the data used originating? Mark all that apply by highlighting the  in red

- Collecting new data on non-City employees (either directly, via another department, or through a non-City entity like a contractor) – fill out Sections 2 and 4
- Private data is shared **to or from** a non-City entity (e.g., vendor) – fill out Sections 2 and 3
- Private data (not public) collected exclusively on City employees or programs (e.g., outcome metrics of a department or program); this includes publishing data for public viewing – fill out Section 2
- Public data sources (e.g., US Census, CDC, any data readily accessible online) – **list all public data sources used below**. For data accessed on the internet, provide a URL through which the data can be accessed. Do not provide a direct download link, but to the page that provides a download/export link.

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<sup>1</sup> [Sanjoseca.gov/digitalprivacy](http://Sanjoseca.gov/digitalprivacy)

## Section 2

If any data used is Private (i.e., not readily accessible to the public at this time), answer the following:

Detail which of the following Personally Identifiable Information (PII) this solution uses, mark all categories and subcategories that apply by highlighting the  in red:

Category of PII	Sub-categories
<input checked="" type="checkbox"/> Personal Data	<p><b>General:</b> <input checked="" type="checkbox"/> Full name; <input type="checkbox"/> Home address; <input type="checkbox"/> Date of birth; <input type="checkbox"/> Place of birth</p> <p><b>Technology:</b> <input checked="" type="checkbox"/> Email address; <input type="checkbox"/> Phone, laptop, or other device IP<sup>2</sup> address; <input type="checkbox"/> Vehicle make, model and year</p> <p><b>Government-issued ID:</b> <input type="checkbox"/> Driver's License; <input type="checkbox"/> Passport; <input type="checkbox"/> Social Security Number; <input type="checkbox"/> Federal Employer ID or Tax ID; <input type="checkbox"/> Employee ID number; <input type="checkbox"/> License Plate</p> <p><b>Financial data:</b> <input type="checkbox"/> Credit or debit card information; <input type="checkbox"/> Bank account, brokerage account or other financial information</p> <p><input type="checkbox"/> <b>Other</b> written or scanned information that can directly tie to an individual or household – detail below:</p>
<input type="checkbox"/> Sensitive PII or demographic-related PII	<p><b>Health data:</b> <input type="checkbox"/> Biometric data; <input type="checkbox"/> Genetic data; <input type="checkbox"/> Physical identifiable characteristics; <input type="checkbox"/> Other health records</p> <p><b>Race/Ethnicity:</b> <input type="checkbox"/> Race or ethnic origin; <input type="checkbox"/> Nationality; <input type="checkbox"/> Immigration status</p> <p><b>Religion/Politics:</b> <input type="checkbox"/> Religious affiliation; <input type="checkbox"/> Political affiliation; <input type="checkbox"/> Voter status</p> <p><b>Sensitive personal records:</b> <input type="checkbox"/> Education records; <input type="checkbox"/> Criminal records</p> <p><input type="checkbox"/> <b>Other</b> sensitive written or scanned information traditionally kept confidential – detail below:</p> <p><b>NOTE:</b> Do not mark if data is only shared/collected/used in aggregate of a population larger than 1,000<sup>3</sup> (e.g., # of registered voters in San José)</p>
<input type="checkbox"/> Image data	<p><input type="checkbox"/> Picture that can identify an individual by their face or other physical and contextual information<sup>4</sup> - detail below:</p>
<input type="checkbox"/> Recording data	<p><input type="checkbox"/> Video that can identify an individual by their face or other physical and contextual information – detail below:</p> <p><input type="checkbox"/> Audio that can identify an individual by their voice or other contextual information – detail below:</p>
<input type="checkbox"/> Geolocation data	<p><input type="checkbox"/> Data affiliated with a vehicle, computer, or other device that can be used to identify an individual's physical location – detail below:</p>

<sup>2</sup> Internet Protocol - An IP address is a unique address that identifies a device on the internet or a local network

<sup>3</sup> Based on reporting requirements used for anonymity by the US Department of Health and Human Services [AFCARS Foster Care Dataset](#); refer to the [2021 codebook, element #6](#)

<sup>4</sup> An example of “contextual information” being used to identify someone could include a picture of a license plate, car make model and year, or a picture of someone’s backside next to a house with a visible address.

Category of PII	Sub-categories
<input type="checkbox"/> Other private or personal information	<i>Detail other data that could directly or indirectly identify an individual:</i>

**Is data being shared publicly?**

- Yes - Share a private version of the dataset / dashboard with the Digital Privacy Office before publishing.
- No

**For Digital Privacy Office** – has the public data been checked for PII?

- Yes
- No
- N/A – data is not shared publicly unless required by law (e.g., court proceeding or public records act request)

**Project details:**

**Project context and purpose:** What is the issue this project is looking to address?

The objective of this project is to optimize and automate the IT onboarding processes where possible, so that all process teams can complete their onboarding activities before the new hires onboard.

**Data collected/shared:** What data is being collected and how will it be collected? You don't have to list every data element, but make sure to summarize the PII you marked in the table above.

Employees name and email address.

**Data Usage:** How will the data be used? What are the usage limitations? Will this data regularly be used for law enforcement purposes, or only if required by law?

The data will be used to initiate several IT processes that are required for an employee to start their job (ie. Active Directory, O365 account creation, Laptop imaging, etc.).

**Data Retention:** How long will the data be kept? Where will the data be stored and who (or what) ensures the data is deleted after the retention period?

The data will be stored in SimpliGov. Access to the data is limited to only those roles that have permission to access the data due to their involvement with the workflow process(es).

**Access to the data:** Who will be able to access the personal information collected? Mark all that apply by highlighting the  **in red**.

- City staff (Not all City staff, just those that have permission to view the workflow data)

Third parties (list parties below, and explain how vendors or other partners can access and use the data):

General public (excluding via a Public Records Act Request)

**Data corrections:** How can data subjects (those who are the subject of the data collected) access their information to edit or correct it?

If there is an issue with the name of the individual, a helpdesk ticket will need to be created in SolarWinds to overwrite the incorrect data.

**Notice:** How will individuals be notified 1) that their data is being collected and 2) how their data will be used? Will individuals have to provide consent (either written, or otherwise recorded) when data is collected?

Individuals will not be notified. This data will be entered by Hiring Managers when they want to have a new employee start a job. The individual whose data it is will not have an option to consent or decline consent.

**Selling data:** Will any of the information be sold by the City or a third-party? *Projects that involve the selling of information will be rejected.*

Yes

No

### Section 3

**If using private data shared from or to a non-City entity, answer the following:**

**Does this solution involve the sharing of any PII as defined in Section 2?**

Yes – answer additional questions below

No

**If yes, answer the questions below:**

**If the data is shared to a non-City entity, will that entity use the data only in a way consistent with the original purpose (purpose stated upon collection)?\***

Yes  No  Unclear

*\*For example, if full name and email address were initially collected to sign up for a Parks mailing list, a solution that sends the emails for this mailing list may be consistent with the existing purpose. However, using the data for a different mailing list would be inconsistent and require an updated privacy notice to the data subjects (data subjects would be the individuals who provided their full name and email address).*

**Attach the policy and/or agreement** that confirms the entity will use the data in a way consistent with the original purpose. *Hint: if the [City's Privacy and Disclosure Policy](#) is part of the vendor contract, you can just attach that.*

Attached     Could not locate policy or policy does not exist

**If policy is not attached**, provide detail (if available) about the existing purpose, data usage and agreement below:

**If data is being used for a new purpose**, attach the document that details the new purpose of the solution.

Attached     Could not locate policy or policy does not exist

If Notice is not attached, provide detail (if available) about the new purpose, data usage and Privacy Notice below:

## Section 4

**If collecting new information**, either directly or through another department or non-City entity, answer the following:

Will the data subject (individual which is the focus of the data collected) be provided a privacy notice upon collection (see definition of privacy notice below)?

Yes  No

*Definition of Privacy Notice: A privacy notice should inform the individual of what is being collected, how it will be used, who can access it, how long it will be stored, and how they correct their data if inaccurate. Often this information is covered in the terms and conditions. Limited notices such as street signs may only provide some of this information upon collection, but all this information should be available somewhere, such as on the City website.*

Will the data subject be required to give “express consent” for the data collected?

Yes  No

*Note: “Express consent” requires a data subject to explicitly agree (usually in writing) to the data usage outlined in the Notice. This can be done via a signature, a check box online, or other explicit method. Providing Notice only requires that the Notice be easily accessible to the data subject, and the data subject is made aware of the Notice and given the opportunity to read the Notice before data collection*

**If the data subject is not provided a Notice** before data collection, explain why below. For example, is the data being collected as part of an arrest, or an emergency response?

The data is being entered by a Hiring Manager to initiate the procurement of software and hardware necessary to the individual starting a new job.

Attach the privacy notice (a digital copy or a scan/photo of a physical copy) that will be provided to the individual upon collection.

Attached  Could not locate notice or notice does not exist

If notice is not attached but still provided, explain the notice provided below:

## Privacy review: Filled out by Digital Privacy Office

The system collects full name and email address of current and recently hired employees in support of the onboarding process. Since no other personal information is being used, data is only collected on employees and not general residents, and the data is used in the interest of supporting employees in their onboarding, this is approved from Privacy.

 Recoverable Signature

**X** Albert Gehami

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Albert Gehami

Digital Privacy Officer

Signed by: 435f4c7e-2188-440c-8663-ca37a7a0da8d